

that transportation means consisting of a carrying structure provided with wheels on a lower side has been known for a long time... There are a number of ways to secure such a stack. One known such way is to ultimately turn the transportation means 90 degrees so that they will rest, not on wheels, but on the carrying structure itself... This solution is known from GB 2207894. The advantage with this solution is that the stack will not be adapted to any pallet format standard. Such a stack will therefore be a bit bulky. Another way to solve this problem is shown in GB 0904198, where the upper surface of the carrying structure is provided with small pockets which is intended to accommodate the wheels. The problem with this solution is that it is a bit difficult to position the transportation means exactly enough to make the wheels engage the pockets...

A slight improvement upon GB 0904198, is known from EP 0675829. The upper surface has here been provided with a bowl-like structure with a shape that corresponds to the radius of the swivel caster wheel as rotated around the swiveling axis. It will be a bit easier to position a transportation means according to EP 0675829, when compared to G 0904198, but the design will allow some sideways movement which does not provide a perfect vertical alignment of the stack.

The original disclosure continued, in the paragraph bridging pages 1-2, that the variation of EP 0675829, which also gives some improvement upon the same as known from GB 2281897, where the bowl-like shapes known from EP 0675829 have been provided with sloping partition walls guiding the wheel into four narrow pockets. The advantage with this solution is that swivel caster wheels might be stuck on top of the partition walls. You will furthermore have to position the transportation means rather exactly in order to make it fall into the correct position (emphasis added)".

These known problems have existed since at least 1994 (the filing date of Dickinson), the Examiner's proposed combination of references still does not satisfy the long felt need in the art to provide a wheel carrying structure which can be stacked on top of a lid placed on the wheeled structure.

The proposed combination of references made by the Examiner still does not provide a solution to this problem.

As noted explicitly in the claimed invention (e.g. claim 1) not only is the carrying structure provided with wheels at each of the four corners of which at least two of the wheels are of the swivel caster wheel type, but that the upper surface of the carrying

structure is provided with receiving means which are configured to receive the wheels of a second transportation means stacked on top of a first transportation means. In addition, lids are provided with receiving means which are configured to receive the wheels of a second transportation means of a second transport assembly stacked on top of a first transportation means so that a plurality of such transport assemblies may be stacked and fixated horizontally one on top of the other. In order to achieve this, the upper surface of the lid is provided not only with two parallel long narrow side channels of the lid stretching from one short side of the lid to the other, which is nowhere shown in the proposed combination of references. While Dickinson does show four depressions to receive the assemblies 30 (see e.g. figures 1 and 4) there are no long side channels of the lid being arranged and extending from one short side of the lid to the other. All of the long side channels of the lid in the claimed invention are arranged at a distance from which each other which is mainly equal to the distance between the wheels (as seen from a short side) wherein transportation means may be arranged on top of the lid by rolling it into engagement with the lid in a lengthwise direction. No such structure is found in any of the cited references including Dickinson, and thus the combination of the individual cited references still does not teach the claimed invention.

Dependent claim 7 also includes the limitation that the long side channels of the lid are placed at a distance from each of the short sides of the long side channels of the lid, which distances adapted to the radius of the wheel so that a wheel is prevented from moving inwards or outwards of the long side channel of the wheel. No such structure is found in any of the references, and thus not found in any possible combination of the combined references. This feature give extra stability such that a stack of transport assemblies / lids can be moved by equipment such as a forklift. Dickinson's depressions permit side-to-side movement, and Broadley's slots permit the wheels to roll of the ends.

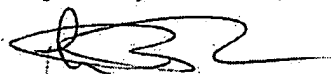
This is not a case of applicants arguing the references separately, but arguing that as

as none of the references teach the claimed limitations, the proposed combination still does not have all the limitations of the claimed invention. For the foregoing reasons, and the reasons set forth in the Amendment After Final Rejection, applicant respectfully submits that the Examiner has failed to establish a prima facie case of obviousness for the claimed invention, because the references clearly lack a teaching of each limitation of the claims and furthermore that applicant has provided a system, despite the number of references utilized not only in the rejection, but also identified by applicants, which clearly satisfies a long felt need in the art, thus providing the "secondary considerations" rebuttal of an alleged prima facie case of obviousness. For the foregoing reasons withdrawal of the rejection and passage of the application to issue are respectfully requested.

The Director is hereby authorized to charge any deficiency in the fees filed, asserted to be filed or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Deposit Account No. 14-1437, under Order No. 8722.009.US0000.

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Respectfully submitted,



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